

Section 1. Registration Information

Source Identification

Facility Name:	Solvay Specialty Polymers USA, LLC, West Deptford
Parent Company #1 Name:	Solvay Specialty Polymers USA, LLC
Parent Company #2 Name:	

Submission and Acceptance

Submission Type:	Re-submission
Subsequent RMP Submission Reason:	5-year update (40 CFR 68.190(b)(1))
Description:	
Receipt Date:	01-Sep-2021
Postmark Date:	01-Sep-2021
Next Due Date:	01-Sep-2026
Completeness Check Date:	01-Sep-2021
Complete RMP:	Yes
De-Registration / Closed Reason:	
De-Registration / Closed Reason Other Text:	
De-Registered / Closed Date:	
De-Registered / Closed Effective Date:	
Certification Received:	Yes

Facility Identification

EPA Facility Identifier:	1000 0013 1733
Other EPA Systems Facility ID:	NJD980753875
Facility Registry System ID:	

Dun and Bradstreet Numbers (DUNS)

Facility DUNS:	143675051
Parent Company #1 DUNS:	94731705
Parent Company #2 DUNS:	

Facility Location Address

Street 1:	10 Leonard Lane
Street 2:	
City:	West Deptford
State:	NEW JERSEY
ZIP:	08086
ZIP4:	2150
County:	GLOUCESTER

Facility Latitude and Longitude

Latitude (decimal):	39.842902
Longitude (decimal):	-75.208859
Lat/Long Method:	Interpolation - Satellite
Lat/Long Description:	Plant Entrance (General)
Horizontal Accuracy Measure:	40
Horizontal Reference Datum Name:	North American Datum of 1983

Source Map Scale Number:

Owner or Operator

Operator Name:	Solvay Specialty Polymers USA, LLC
Operator Phone:	(856) 853-8119

Mailing Address

Operator Street 1:	10 Leonard Lane
Operator Street 2:	
Operator City:	West Deptford
Operator State:	NEW JERSEY
Operator ZIP:	08086
Operator ZIP4:	2150
Operator Foreign State or Province:	
Operator Foreign ZIP:	
Operator Foreign Country:	

Name and title of person or position responsible for Part 68 (RMP) Implementation

RMP Name of Person:	Terence Tham
RMP Title of Person or Position:	Site Manager
RMP E-mail Address:	terence.tham@solvay.com

Emergency Contact

Emergency Contact Name:	Terence Tham
Emergency Contact Title:	Site Manager
Emergency Contact Phone:	(856) 251-3489
Emergency Contact 24-Hour Phone:	(856) 853-8119
Emergency Contact Ext. or PIN:	
Emergency Contact E-mail Address:	terence.tham@solvay.com

Other Points of Contact

Facility or Parent Company E-mail Address:	
Facility Public Contact Phone:	(856) 853-8119
Facility or Parent Company WWW Homepage Address:	www.solvay.com/en/chemical-categories/specialty-polymers

Local Emergency Planning Committee

LEPC:	West Deptford Twp LEPC
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Full Time Equivalent Employees

Number of Full Time Employees (FTE) on Site:	120
FTE Claimed as CBI:	

Covered By

OSHA PSM :	Yes
EPCRA 302 :	Yes

CAA Title V:	Yes
Air Operating Permit ID:	55798

OSHA Ranking

OSHA Star or Merit Ranking:	Y
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Last Safety Inspection

Last Safety Inspection (By an External Agency) Date:	06-Feb-2020
Last Safety Inspection Performed By an External Agency:	State environmental agency

Predictive Filing

Did this RMP involve predictive filing?:

Preparer Information

Preparer Name:
Preparer Phone:
Preparer Street 1:
Preparer Street 2:
Preparer City:
Preparer State:
Preparer ZIP:
Preparer ZIP4:
Preparer Foreign State:
Preparer Foreign Country:
Preparer Foreign ZIP:

Confidential Business Information (CBI)

CBI Claimed:
Substantiation Provided:
Unsanitized RMP Provided:

Reportable Accidents

Reportable Accidents:	See Section 6. Accident History below to determine if there were any accidents reported for this RMP.
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Process Chemicals

Process ID:	1000118811
Description:	WD Plant Process
Process Chemical ID:	1000148573
Program Level:	Program Level 3 process
Chemical Name:	Vinylidene fluoride [Ethene, 1,1-difluoro-]
CAS Number:	75-38-7
Quantity (lbs):	960000
CBI Claimed:	
Flammable/Toxic:	Flammable

Process NAICS

Process ID:	1000118811
Process NAICS ID:	1000120164
Program Level:	Program Level 3 process
NAICS Code:	325211
NAICS Description:	Plastics Material and Resin Manufacturing

Section 2. Toxics: Worst Case

No records found.

Section 3. Toxics: Alternative Release

No records found.

Section 4. Flammables: Worst Case

Flammable Worst ID: 1000072541

Model Used:	EPA's RMP*Comp(TM)
Endpoint used:	1 PSI

Passive Mitigation Considered

Blast Walls:
Other Type:

Section 5. Flammables: Alternative Release

Flammable Alter ID: 1000067957

Model Used:

EPA's RMP*Comp(TM)

Passive Mitigation Considered

Dikes:

Fire Walls:

Blast Walls:

Enclosures:

Other Type:

Active Mitigation Considered

Sprinkler System:

Deluge System:

Water Curtain:

Excess Flow Valve:

Other Type:

Section 6. Accident History

No records found.

Section 7. Program Level 3

Description

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Program Level 3 Prevention Program Chemicals

Prevention Program Chemical ID:	1000127900
Chemical Name:	Vinylidene fluoride [Ethene, 1,1-difluoro-]
Flammable/Toxic:	Flammable
CAS Number:	75-38-7

Process ID:	1000118811
Description:	WD Plant Process
Prevention Program Level 3 ID:	1000101861
NAICS Code:	325211

Safety Information

Safety Review Date (The date on which the safety information was last reviewed or revised):	10-Aug-2020
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Process Hazard Analysis (PHA)

PHA Completion Date (Date of last PHA or PHA update):	23-Jun-2021
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The Technique Used

What If:	
Checklist:	
What If/Checklist:	Yes
HAZOP:	Yes
Failure Mode and Effects Analysis:	
Fault Tree Analysis:	
Other Technique Used:	
PHA Change Completion Date (The expected or actual date of completion of all changes resulting from last PHA or PHA update):	23-Jun-2022

Major Hazards Identified

Toxic Release:	Yes
Fire:	Yes
Explosion:	Yes
Runaway Reaction:	Yes
Polymerization:	Yes
Overpressurization:	Yes
Corrosion:	Yes
Overfilling:	Yes
Contamination:	Yes
Equipment Failure:	Yes
Loss of Cooling, Heating, Electricity, Instrument Air:	Yes

Earthquake:
Floods (Flood Plain):
Tornado:
Hurricanes:
Other Major Hazard Identified:

Process Controls in Use

Vents:	Yes
Relief Valves:	Yes
Check Valves:	Yes
Scrubbers:	Yes
Flares:	
Manual Shutoffs:	Yes
Automatic Shutoffs:	Yes
Interlocks:	Yes
Alarms and Procedures:	Yes
Keyed Bypass:	Yes
Emergency Air Supply:	
Emergency Power:	Yes
Backup Pump:	Yes
Grounding Equipment:	Yes
Inhibitor Addition:	
Rupture Disks:	Yes
Excess Flow Device:	Yes
Quench System:	Yes
Purge System:	Yes
None:	
Other Process Control in Use:	

Mitigation Systems in Use

Sprinkler System:	Yes
Dikes:	Yes
Fire Walls:	
Blast Walls:	Yes
Deluge System:	Yes
Water Curtain:	
Enclosure:	
Neutralization:	
None:	
Other Mitigation System in Use:	

Monitoring/Detection Systems in Use

Process Area Detectors:	
Perimeter Monitors:	
None:	Yes
Other Monitoring/Detection System in Use:	

Changes Since Last PHA Update

Reduction in Chemical Inventory:	
Increase in Chemical Inventory:	
Change Process Parameters:	Yes

Installation of Process Controls:
Installation of Process Detection Systems:
Installation of Perimeter Monitoring Systems:
Installation of Mitigation Systems:
None Recommended:
None:
Other Changes Since Last PHA or PHA Update:

Review of Operating Procedures

Operating Procedures Revision Date (The date of the most recent review or revision of operating procedures): 24-Mar-2021

Training

Training Revision Date (The date of the most recent review or revision of training programs): 19-Feb-2021

The Type of Training Provided

Classroom: Yes
On the Job: Yes
Other Training:

The Type of Competency Testing Used

Written Tests:
Oral Tests:
Demonstration: Yes
Observation:
Other Type of Competency Testing Used:

Maintenance

Maintenance Procedures Revision Date (The date of the most recent review or revision of maintenance procedures): 19-Feb-2021

Equipment Inspection Date (The date of the most recent equipment inspection or test): 27-Jul-2021

Equipment Tested (Equipment most recently inspected or tested): PSV-20455 (Monomer Dryer Discharge)

Management of Change

Change Management Date (The date of the most recent change that triggered management of change procedures): 13-Aug-2021

Change Management Revision Date (The date of the most recent review or revision of management of change procedures): 30-Jun-2021

Pre-Startup Review

Pre-Startup Review Date (The date of the most recent pre-startup review): 30-Aug-2021

Compliance Audits

Compliance Audit Date (The date of the most recent compliance audit): 10-Aug-2020

Compliance Audit Change Completion Date (Expected or actual date of completion of all changes resulting from the compliance audit): 09-Aug-2021

Incident Investigation

Incident Investigation Date (The date of the most recent incident investigation (if any)): 25-Aug-2021

Incident Investigation Change Date (The expected or actual date of completion of all changes resulting from the investigation): 23-Nov-2021

Employee Participation Plans

Participation Plan Revision Date (The date of the most recent review or revision of employee participation plans): 11-May-2021

Hot Work Permit Procedures

Hot Work permit Review Date (The date of the most recent review or revision of hot work permit procedures): 11-May-2021

Contractor Safety Procedures

Contractor Safety Procedures Review Date (The date of the most recent review or revision of contractor safety procedures): 22-Apr-2020

Contractor Safety Performance Evaluation Date (The date of the most recent review or revision of contractor safety performance): 30-Aug-2021

Confidential Business Information

CBI Claimed:

Section 8. Program Level 2

No records found.

Section 9. Emergency Response

Written Emergency Response (ER) Plan

Community Plan (Is facility included in written community emergency response plan?): Yes

Facility Plan (Does facility have its own written emergency response plan?): Yes

Response Actions (Does ER plan include specific actions to be taken in response to accidental releases of regulated substance(s)?): Yes

Public Information (Does ER plan include procedures for informing the public and local agencies responding to accidental release?): Yes

Healthcare (Does facility's ER plan include information on emergency health care?): Yes

Emergency Response Review

Review Date (Date of most recent review or update of facility's ER plan): 18-Aug-2021

Emergency Response Training

Training Date (Date of most recent review or update of facility's employees): 20-Nov-2020

Local Agency

Agency Name (Name of local agency with which the facility ER plan or response activities are coordinated): West Deptford Twp LEPC

Agency Phone Number (Phone number of local agency with which the facility ER plan or response activities are coordinated): (856) 845-4004

Subject to

OSHA Regulations at 29 CFR 1910.38: Yes

OSHA Regulations at 29 CFR 1910.120: Yes

Clean Water Regulations at 40 CFR 112: Yes

RCRA Regulations at CFR 264, 265, and 279.52: Yes

OPA 90 Regulations at 40 CFR 112, 33 CFR 154, 49 CFR 194, or 30 CFR 254: Yes

State EPCRA Rules or Laws: Yes

Other (Specify): NJ TCPA, NJ DPCC

Executive Summary

Solvay Specialty Polymers USA, LLC
West Deptford Facility
Risk Management Plan - Executive Summary

1. Accidental Release Prevention and Emergency Response Policies

The Solvay Specialty Polymers West Deptford facility (SSPWD) is committed to operating and maintaining all of our processes in a safe and responsible manner. SSPWD uses a combination of accidental release prevention programs and emergency response planning programs to help ensure the safety of our employees and the public and protection of the environment.

SSPWD Site Management is committed to chemical safety as demonstrated by their participation in the Mantua Grove Community Advisory Panel of local citizens and American Chemistry Council Responsible Care Program, their application to be an OSHA Voluntary Protection Program (VPP) site.

Solvay Specialty Polymers USA, LLC (SSPUSA) firmly believes that being excellent in health, safety, environment and quality (HSEQ) is crucial for generating a growing, successful and sustainable business.

2. Stationary Source and Regulated Substances

SSPWD produces various grades of HYLAR PVDF which are used in the formulation of corrosion resistant coatings for aluminum and steel as well as long-life decorative finishes on building panels.

SSPWD has the following chemical that are covered by the US-EPA Chemical Accident Prevention Provisions, 40 CFR 68:
- Vinylidene Fluoride (VF2) is both an intermediate product and sold as a product.

The accidental release prevention programs and contingency planning efforts at SSPWD facilitate effective management of the hazards posed to our employees, the public, and the environment.

3. General Accidental Release Prevention Program and Chemical-Specific Prevention Steps

SSPWD management systems address each of the key features of successful prevention programs including but not limited to: Process Safety Information, Process Hazard Analysis, Standard Operating Procedures, Training, Mechanical Integrity, Management of Change, Pre-Startup Safety Review, Compliance Safety Audits, Incident Investigation, Employee Participation, Hot Work Permit, Contractors, Inspections, and Monitoring.

SSPWD utilizes numerous engineered and administrative controls to ensure the safe use and handling of regulated materials. Such controls include but not limited to sensors and alarms, automatic shut-off valves, computer-controlled monitoring with remote shut-offs, safety instrumented functions, remotely-controlled water cannons, surveillance cameras, and on-site security team.

4. Five-year Accident History

In the past five-year period, SSPWD has had no releases of Vinylidene Fluoride that resulted in deaths, injuries, or significant property damage on site or known offsite deaths, injuries, evacuations, sheltering in place, property damage, or environmental damage.

5. Emergency Response Program

The Emergency Response Program is designed to assure that SSPWD employees are prepared to respond to emergency situations which may occur at the facility.

The Program involves the following elements:

Emergency Response Plan:

SSPWD maintains an integrated contingency plan, which consolidates all of the various federal, state, and local regulatory requirements for emergency response planning. The program provides the essential planning and training for effectively protecting workers, the public, and the environment during emergency situations. The plan includes instructions for: emergency reporting and plan activation, notification of emergency responders, emergency shutdown procedures, establishment of an emergency command center and field command post, duties of key individuals, procedures for fire, chemical release, off-site spills, hurricane, bomb threat, evacuation procedures, HAZMAT procedures, and emergency response equipment information.

The Emergency Response Plan has been coordinated with local emergency management services. Local community emergency responders participate in annual drills at the facility. There is a post-drill review of all exercises to assess the effectiveness of the Emergency Response Plan.

The facility retains emergency response contractors with specific expertise to aid in response and clean-up and to render other assistance as needed.

Emergency Response Training:

All emergency response team members receive annual training in: alarm identification and response, response to an HHC (or EHS) or other type of release, use of personal protective equipment, rescue procedures, evacuation procedures, medical / first aid procedures, action plans dealing with specific scenarios, specifically assigned emergency response duties, regulations review, hazard communication / toxicology / health hazard review, air monitoring equipment, incident command system, work zones and decontamination, containment procedures and spill control techniques, confined space review, and comprehensive testing to verify understanding of the material.

Emergency Response Equipment and Systems:

In the event of an emergency, the following are some of the response equipment available onsite so mitigation activities can begin immediately:

- Trained emergency responders on every shift
- Personal protective equipment (e.g., protective clothing, self-contained breathing apparatus)
- Isolation valves (manual or automated)
- Automated shutdown systems
- Curbing or diking to contain liquid releases
- Fire suppression and extinguishing systems
- Deluge system for specific equipment
- High pressure fire water system with remote and manual water spray suppression
- Surveillance cameras
- Spill containment equipment and supplies
- Back-up equipment (Fire Water Pump, Uninterruptible Power Supply for process control system)
- Meteorological equipment

An on-site Emergency Command Center (ECC) is set up and includes telephone, fax, and PC capability for use in the event of a major incident. The ECC will be activated by the Emergency Response Coordinator and used by the Site Management Team to coordinate auxiliary response efforts.

6. Planned Changes to Improve Safety

In preparation for submittal of this RMP, SSPWD has completed installation of the following changes to improve safety, make the site more sustainable and inherently safer:

- SSPWD has discontinued the use of Hydrogen Fluoride (HF) as a raw material. (HF is a regulated toxic material.)
- SSPWD, as a result of the discontinuation of HF, produces a significantly less amount of anhydrous Hydrogen Chloride (aHCl) in-situ to the process. (aHCl is a regulated toxic material.)
- SSPWD has discontinued the use of Vinylidene Chloride (VDC) as a raw material. (VDC is a regulated toxic material.)

SSPWD will continue to incorporate the findings from incident investigations, inherently safer technology reviews, and the recommendations developed during process hazard analysis as a means of continuously improving the safety at the West Deptford facility.